

## Memo

**To:** Social Security Administration  
**From:** Mathematica  
**Date:** 11/9/2021  
**Subject:** Request for Information on Potential Disability Insurance and Supplemental Security Income Demonstrations

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The Commissioner of the Social Security Administration (SSA) can conduct demonstration projects testing initiatives to (1) promote employment and economic self-sufficiency of individuals receiving or applying for Social Security Disability Insurance (DI) and Supplemental Security Income (SSI); and (2) to improve the administration and effectiveness of DI, SSI, and related programs. This authority comes from two sources. Section 234(d)(2) of the Social Security Act provides the authority to conduct demonstrations among volunteer DI beneficiaries and the authority to initiate projects is set to expire on December 31, 2021. Section 1110 of the Social Security Act provides the authority to conduct demonstrations among volunteer SSI recipients. Under both, demonstration participants must provide written informed consent to volunteer and can withdraw at any time. Section 1110 also requires that participation cannot result in a substantial reduction in income.

To further its mission of delivering quality Social Security services to the public, we suggest SSA consider testing policy and service changes in three key areas: (1) streamline beneficiary reporting and program rules to reduce overpayments, (2) provide services to facilitate employment, and (3) modify SSA rules governing how earnings effect benefits. Tables 1a through 1c outline the specific suggestions.

The necessary demonstration authority to conduct the proposed interventions varies. Some of the suggested interventions do not require demonstration authority at all—for example, sending earnings reporting reminders to DI beneficiaries or developing and testing new features of the DI eligibility determination process. Many interventions require renewal of Section 234 demonstration authority and some of those appear appropriate for a volunteer-based demonstration. However, a demonstration authority allowing for mandatory participation would likely enhance others. For example, one intervention would expand employment services to beneficiaries who leave the DI rolls for work. A volunteer-based demonstration might recruit those most motivated to maintain employment who want to take advantage of all available resources and opportunities or could recruit those whose long-term employment is most tenuous and are most in-need of services. However, it would be difficult to discern which group volunteered for the demonstration, making it difficult to generalize results.

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**Table 1a. Summary of demonstration proposal ideas: Streamline beneficiary reporting and reduce overpayments**

Demonstration proposal	Goal	Intended population	Relevant statute, regulation, or policy	Proposed service	Reason for policy or service change	Partnerships	Change to demonstration authority	Intervention previously proposed or tested
<b>Streamline beneficiary reporting and reduce overpayments</b>								
Mitigating the burden of reporting compliance	Facilitate compliance with reporting responsibilities	All DI beneficiaries	Compliance with beneficiary reporting responsibilities, including DI work reports (DI 13010.020)	Electronic dissemination and collection of forms. SSA would send notifications either (1) via the MySSA app including a link to a pre-populated form or (2) email a blank form to beneficiaries. Forms could be electronically submitted through the MySSA account. This could apply to any required form, including reporting earnings.	Beneficiaries' mailing addresses often change and if beneficiaries do not update their addresses with SSA, they might not receive critical forms mailed to them. For those registered on mySSA.gov, SSA has an email address associated with the MySSA account that is unlikely to change. SSA could use email and MySSA accounts to promote electronic exchange of information and improved compliance with reporting requirements.	None	No demonstration authority needed	No
Earning reporting reminders to DI beneficiaries	Encourage beneficiary earning reporting and thereby reduce work-related overpayments	Either all DI beneficiaries or new DI beneficiaries with awards in the past 5 years	Improve on SSA's written communications	Send earning reminder postcard to DI beneficiaries. Test the effectiveness of annual and quarterly reminders relative to no reminders.	A behavioral economics evaluation found SSA's written communications to beneficiaries about earnings reporting to be inadequate (Hoffman et al. 2020a). Also, SSA tested earning reporting reminders for SSI, with promising results (Zhang et al. 2020).	None	No demonstration authority needed	Similar intervention tested in SSI (Zhang et al. 2020)

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Demonstration proposal	Goal	Intended population	Relevant statute, regulation, or policy	Proposed service	Reason for policy or service change	Partnerships	Change to demonstration authority	Intervention previously proposed or tested
Extend the grace period	Reduce work-related overpayments	Newly awarded DI beneficiaries	DI Extended Period of Eligibility (DI 13010.210)	Extend the 3-month grace period to match the median time for SSA to identify and process earnings reports.	Work-related overpayments are prevalent (Hoffman et al. 2019), there is evidence overpayments cause reductions in earnings (Hoffman et al. 2020b), only about half are recovered within 10 years (SSA Office of the Inspector General 2015), and cost about \$0.06 for every dollar recovered (SSA 2020). The grace period is designed to provide SSA time to process earnings reporting and properly adjust benefit payments. However, in practice, SSA is often delayed beyond the 3-month grace period in identifying and processing earnings.	None	Extension of DI demonstration authority; further enhanced if based on nonvolunteer population	No

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Demonstration proposal	Goal	Intended population	Relevant statute, regulation, or policy	Proposed service	Reason for policy or service change	Partnerships	Change to demonstration authority	Intervention previously proposed or tested
Report earnings only after an SSA prompt	Reduce work-related overpayments	Newly awarded DI beneficiaries	DI Work Report (DI 13010.020)	Require new awardee beneficiaries to report earnings only after an SSA prompt. SSA would prompt beneficiaries to report after earnings exceed an annualized trial work period threshold by sending monthly prompts to submit earnings.	About two-thirds of DI beneficiaries are not aware of the trial work period (TWP) and even more are unfamiliar with the extended period of eligibility (SSA 2018). Recent demonstrations, such as the Promoting Opportunity Demonstration (POD), attempted to eliminate the TWP, signaling an interest by legislators in modifying these provisions. In addition, work-related overpayments are prevalent (Hoffman et al. 2020b).	None	Extension of DI demonstration authority; further enhanced if based on nonvolunteer population	No
Beneficiary annual earning reporting	Reduce work-related overpayments and streamline overpayment collection	Newly awarded DI beneficiaries	DI Work Report (DI 13010.020)	DI would move from a monthly to an annual accounting period. Beneficiaries who plan to work would report estimated annual earnings before the start of each calendar year, which SSA would use to estimate benefit reductions. Any payment errors would be reconciled when filing taxes.	Under the Affordable Care Act, people who enroll in Marketplace health care plans reconcile any difference between advance tax credit payments based on estimated annual earnings and actual owed payments, as determined by annual income submitted to the Internal Revenue Service when filing federal taxes. This same process would be applied to streamline resolution of DI payment errors.	Internal Revenue Service	Extension of DI demonstration authority; further enhanced if based on nonvolunteer population	Annual accounting period and annual earnings estimates were part of SSA's Benefit Offset National Demonstration

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Demonstration proposal	Goal	Intended population	Relevant statute, regulation, or policy	Proposed service	Reason for policy or service change	Partnerships	Change to demonstration authority	Intervention previously proposed or tested
Eliminate the Substantial Gainful Activity (SGA) criteria for childhood disability beneficiaries (CDBs) at attainment of the full retirement age	Reduce work-related overpayments among older CDBs and improve their economic well-being	DI CDB beneficiaries who reach their own full retirement age	DI SGA (DI 24001.025)	Eliminate the SGA criteria during the extended period of eligibility for aging CDBs.	As auxiliary beneficiaries, CDBs continue to remain subject to SGA criteria even after they reach full retirement age and might have benefits suspended or overpaid due to SGA. This contrasts with disabled worker DI beneficiaries who are no longer subject to work or medical continuing disability reviews (CDRs) after full retirement age and SSA retirement beneficiaries who are no longer subject to the annual earnings test after full retirement age.	None	Extension of DI demonstration authority	No

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**Table 1b. Summary of demonstration proposal ideas: Provide services to promote employment and reduce reliance on benefits**

Demonstration proposal	Goal	Intended population	Relevant statute, regulation, or policy	Proposed service	Reason for policy or service change	Partnerships	Change to demonstration authority	Intervention previously proposed or tested
Employment services for high-frequency users of short-term disability insurance	Improve employment outcomes, decrease benefit reliance	At-risk workers identified from state short-term disability and/or Worker's Compensation programs	Employment support services	Coordinate with state short-term disability insurance and Worker's Compensation providers to provide stay at work and return to work services like those provided through Retaining Employment and Talent After Injury/Illness Network (RETAIN).	Evidence suggests workers who have higher frequency use of short-term disability insurance while employed are more likely to apply for and receive DI benefits. Targeting these workers early to provide stay at work or return to work services might help workers reduce long-term disability and remain working.	Short-term disability insurance providers and/or Worker's Compensation programs	Extension of DI demonstration authority	A similar intervention is being tested under RETAIN
Employment and Eligibility Services (EES) System	Improve employment outcomes, decrease benefit reliance	Participants in a state's RETAIN program who are unable to return to substantial work within 5 months	SSA's disability determination process	Triage those who exit RETAIN services without returning to substantial work into three groups: (1) immediate DI eligibility; (2) additional return to work supports including time-limited cash benefits for up to 7 months; (3) no further supports. Those who take up additional return to work supports but do not succeed in returning to substantial work will have their eligibility for DI redetermined.	Significant numbers of workers exit the labor force and apply for DI because they failed to obtain timely, evidence-based supports. Although RETAIN aims to help workers in the first few months after they experience a work disability, a sizeable portion of those who receive RETAIN services will not return to substantial work and might benefit from additional return to work supports and time-limited cash benefits. In the absence of such supports, they will very likely apply to and qualify for DI.	U.S. Department of Labor, state RETAIN programs, Disability Determination Services, possibly other state agencies (for example, vocational rehabilitation, workforce development and labor), possibly Rehabilitation Services Administration (RSA)	No demonstration authority needed; SSA can use the commissioner's regulatory authority to develop and test new features of the DI eligibility determination process without making changes to the legal definition of DI eligibility or to DI benefits	Intervention proposed but not yet tested (Stapleton et al. 2019)

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Demonstration proposal	Goal	Intended population	Relevant statute, regulation, or policy	Proposed service	Reason for policy or service change	Partnerships	Change to demonstration authority	Intervention previously proposed or tested
Progressive Employment (PE) for DI and SSI recipients	Improve employment outcomes, decrease benefit reliance	Adult DI and SSI applicants or recent awardees receiving vocational rehabilitation (VR) services	Ticket to Work (Section 1148)	PE is a dual customer service approach that uses work-based learning strategies to meet the needs of businesses and jobseekers with disabilities and other barriers to employment. PE has a well-defined, replicable model, notably including no client considered unready for work, VR-paid workplace learning opportunities, and minimization of hiring risk to employer.	The rationale is to improve employment outcomes of VR clients who receive SSI or DI and reduce their reliance on benefits and other public programs.	RSA; Institute for Community Inclusion (ICI) at UMass Boston; possibly one or more state VR agencies. With funding from RSA, ICI provides technical assistance to state VR agencies seeking to implement PE	Extension of DI demonstration authority and designed to be allowable under Section 1110 for SSI	Non-experimental research using data from Vermont and Nebraska VR agencies that have adopted PE is promising, but insufficiently rigorous (Mann et al. 2018; Moore et al. 2020)
Work Incentives Planning and Assistance (WIPA) outreach to new DI beneficiaries	Encourage beneficiaries to set and achieve work goals, while avoiding overpayments	New DI beneficiaries	Benefits counseling	Conduct outreach to new DI beneficiaries to inform them of rules and services that affect return to work. Could include group virtual sessions or one-on-one services.	Although WIPA is available to all DI beneficiaries, only 18% are aware of the support (SSA 2018). WIPA outreach could be one way to provide transparency to beneficiaries and facilitate return to work. WIPA's predecessor, Benefits Planning Assistance and Outreach (BPAO) included outreach to beneficiaries. In contrast, WIPA staff are instructed to prioritize working beneficiaries and do not conduct outreach.	WIPA	Extension of DI demonstration authority; further enhanced if based on nonvolunteer population	BPAO conducted outreach, but the effectiveness was not systematically tested

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Demonstration proposal	Goal	Intended population	Relevant statute, regulation, or policy	Proposed service	Reason for policy or service change	Partnerships	Change to demonstration authority	Intervention previously proposed or tested
Promoting employment through an employment curriculum	Improve employment outcomes	SSI youth ages 18 to 24	Employment support services	The Family Employment Awareness Training (FEAT) is a two-part training for youth with disabilities transitioning from school to adulthood, their families, and the professionals who support them. Its purpose is to raise expectations in obtaining competitive employment and increase their knowledge of how local, state, and federal resources can make employment a reality. Training could be provided through Centers for Independent Living.	Employment might be low among youth with disabilities because of low expectations about employment (Mann et al. 2016), limited access to employment service providers (National Disability Rights Network 2011), and ineffective transition plans (Francis et al. 2014), among other reasons.	Centers for Independent Living	Extension of DI demonstration authority	FEAT is one of the 12 papers developed for the SSI Youth Solutions project (Gross et al. 2021); there is limited evidence on its effectiveness
Promoting postsecondary education and training options	Improve employment outcomes	SSI youth ages 18 to 24	Employment support services	State VR agency connects youth to relevant postsecondary education and training programs.	Youth with disabilities rarely receive postsecondary education, likely because of systematic barriers to access (Howe et al. 2021). A recent evaluation of a Vermont transition program found a postsecondary education emphasis by VR staff had positive impacts with high school students' enrollment in postsecondary education (Sevak et al. 2021)	VR	Extension of DI demonstration authority	Similar to an intervention proposed in Howe et al. (2021)



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Demonstration proposal	Goal	Intended population	Relevant statute, regulation, or policy	Proposed service	Reason for policy or service change	Partnerships	Change to demonstration authority	Intervention previously proposed or tested
Job Corps for SSI Youth	Improve employment outcomes, decrease benefit reliance	SSI child or adult recipients ages 16 to 24	Employment support services	Job Corps is a predominantly residential program that provides training on in-demand work skills and support services (including health care) to youth in low-income households. SSA could also consider testing extension of Student Earned Income Exclusion to age 24 within this demonstration.	The purpose of the intervention is to substantially boost the career earnings trajectories of SSI youth and reduce their lifetime reliance on SSI, DI, and other public programs—relative to outcomes they are likely to achieve with support from VR or other less-intensive services.	U.S. Department of Labor Job Corps; possibly RSA or a state VR agency	Could be designed to be allowable under Section 1110 [42 U.S.C. 1310] (a)	Evidence of 4-year earnings impacts and reduction in SSI receipt among youth with medical limitations (Hock et al. 2021)  Arnold Ventures supported a similar randomized controlled trial in Illinois; it was terminated due to COVID-19

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Demonstration proposal	Goal	Intended population	Relevant statute, regulation, or policy	Proposed service	Reason for policy or service change	Partnerships	Change to demonstration authority	Intervention previously proposed or tested
Extension of Student Earned Income Exclusion (SEIE) to all recipients of Transition to Economic Self-Sufficiency (TESS) scholarships	Improve employment outcomes, decrease benefit reliance	TESS scholars up to age 30	Employment support services	SSI waiver under which the SEIE would apply to all TESS scholars of all ages up to 30. Scholarships will initially be offered by lottery to support evaluation. TESS is a private–state scholarship program that addresses many significant barriers to career success faced by young adults in the target population who actively work toward economic independence by age 30. TESS offers coaching and significant financial support for education, training, and initial employment, starting as early as age 18 for up to 10 years (Stapleton et al. 2021).	An extensive literature identifies the numerous barriers to career success faced by young SSI recipients (Stapleton et al. 2021). TESS scholarships aim to boost career earnings of the intended population and reduce their dependence on public benefits. The SEIE waiver would allow the program to reduce the size of the scholarship by reducing the need to defray reductions in SSI income. The SEIE waiver would allow states to increase the number of scholarships available and thereby increase the power of the test.	State VR agencies	Could be designed to be allowable under Section 1110 [42 U.S.C. 1310] (a)	Vermont plans to implement TESS and is likely the first rigorous test of TESS scholarships or something similar

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Demonstration proposal	Goal	Intended population	Relevant statute, regulation, or policy	Proposed service	Reason for policy or service change	Partnerships	Change to demonstration authority	Intervention previously proposed or tested
Test of customized employment (CE) service model	Improve employment outcomes	SSI and DI beneficiaries with intellectual or development disabilities (IDDs) or autism spectrum disorder (ASD); alternatively, this CE service model could be tested among individuals with IDD and other significant disabilities who receive services through community rehabilitation providers (~450 agencies) that are part of the AbilityOne network	Employment support services	A customized employment service model that matches people with IDD and people with ASD to competitive employment, designed by SourceAmerica.	<p>Conducting a rigorous test of a CE intervention with a large sample will build evidence of the causal impacts of CE on employment outcomes among people with significant disabilities.</p> <p>Although the population that participated in the SourceAmerica pilot test of CE was small (~159), a sizeable share (56 percent) secured competitive employment; many (38 percent) had monthly earnings at or above SGA and sustained their employment long term. Many of these program participants were not working or earning subminimum wages before enrolling in the program.</p>	SourceAmerica	Extension of DI demonstration authority	Previous studies have found encouraging employment outcomes from CE approaches (Elinson et al. 2008; Luecking et al. 2008); however, there have been no rigorous studies estimating the causal impacts of a CE program on employment outcomes (Riesen et al. 2015)
Supporting beneficiaries who exit DI because of earnings	Maintain employment, reduce return to DI benefits	DI beneficiaries whose benefits SSA terminates because of earnings	Ticket to Work (TTW) (Section 1148)	Expand TTW to support beneficiaries who leave the rolls for work through providers geared toward employment retention. Would apply to beneficiaries who leave the rolls due to work but who are not enrolled in TTW.	More than one-third of beneficiaries who leave DI because of earnings return to benefits (Anderson et al. 2021). Most also do not participate in TTW and so might lack access to employment supports after leaving benefits.	Work retention providers	Extension of DI demonstration authority; further enhanced if based on nonvolunteer population	Might be informed by SSA's Exits from Disability Demonstration

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**Table 1c. Summary of demonstration proposal ideas: Modify SSA rules governing how earnings effect benefits**

Demonstration proposal	Goal	Intended population	Relevant statute, regulation, or policy	Proposed service	Reason for policy or service change	Partnerships	Change to demonstration authority	Intervention previously proposed or tested
Employment Support for the Transition to Retirement	Continued employment among older workers and forestall DI benefit receipt	Low-wage DI applicants ages 50 and older determined to be disability-insured and have a significant, long-term chronic condition or impairment		Qualifying older DI applicants will receive an Earned Income Tax Credit (EITC)-style benefit as an alternative to continued pursuit of DI. They will also receive a small fixed allowance designed to cover impairment-related work expenses.	Older workers who experience disability onset exit the labor force and enter DI (Schimmel Hyde et al. forthcoming). Many older denied applicants reapply for DI or claim Old-Age and Survivors Insurance (OASI) at age 62 (Schimmel Hyde and Wu 2020). A growing body of evidence has found the EITC for parents with low incomes has positive effects on earnings and household income (Chetty et al. 2013). The effect of a substantial EITC for older workers with significant medical conditions has not been tested. This proposal uses the principles of self-directed services that have been shown to work well for long-term services and supports as well as other services.	None (assuming SSA could collect or access wage data)	Extension of DI demonstration authority; further enhanced if based on nonvolunteer population	An EITC-style credit for workers with disabilities and older workers is common to numerous proposals, including Burkhauser et al. (1997); Gokhale (2013);and Stapleton and Schimmel Hyde (2017); Schvedov and Scramm (2020) proposed a similar idea for workers older than 65

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Demonstration proposal	Goal	Intended population	Relevant statute, regulation, or policy	Proposed service	Reason for policy or service change	Partnerships	Change to demonstration authority	Intervention previously proposed or tested
Tiered benefit offset	Beneficiary employment	DI beneficiaries (excluding those also receiving SSI)	DI SGA (DI 24001.025)	Implement a tiered offset: \$1 offset for every \$3 over SGA up to \$2,000/month; \$1 for \$2 offset for every dollar over SGA up to \$3,500/month; full offset applies for earnings over \$3,501/month. Offset will be applied monthly. No subsidy or impairment-related work expenses.	Beneficiaries with low earnings face the largest work disincentives returning to SGA. Reducing the financial limitations that a \$1 for \$2 reduction can impose could reduce that fear.	None	Extension of DI demonstration authority; further enhanced if based on nonvolunteer population	Similar to the Benefit Offset National Demonstration; different offset and with monthly accounting
Incentives for employed blind DI beneficiaries to increase earnings	Increase beneficiary earnings	DI beneficiaries who are blind and working at nonprofit agencies (NPAs) through the Federal Ability One program	DI SGA (DI 24001.025)	Implement a benefit offset for employed blind beneficiaries and provide benefits and financial counseling through NPAs. Seek to engage beneficiaries have established relationships with NPA staff.	Survey and anecdotal evidence suggest many of their blind employees park, either by limiting hours or turning down promotions.	National Industries for the Blind	Extension of DI demonstration authority	Similar to the Benefit Offset National Demonstration; different population, could test different offsets, and different counseling providers

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